



CBFO MANAGEMENT PROCEDURE Carlsbad Field Office

MP No. 5.2

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Revision 0

Title: **TRU WASTE SITE CERTIFICATION/RECERTIFICATION**

[Signature] 6/13/02
for *[Signature]*
Manager, Carlsbad Field Office

6/18/02
Effective Date

1.0 **PURPOSE**

The purpose of this procedure is to define the process, responsibilities, and controls for the activities related to granting site certification authority to transuranic (TRU) waste sites in order to characterize and ship TRU waste to the Waste Isolation Pilot Plant (WIPP).

2.0 **SCOPE**

This procedure specifies the process necessary and Carlsbad Field Office (CBFO) actions required for TRU waste site certification, the site and National TRU Program (NTP) declarations of readiness for audit, and the issuance of site certification authorization by the CBFO Manager (see Attachment 1).

3.0 **REFERENCES AND DEFINITIONS**

3.1 References

- CBFO Management Procedure (MP) 3.1, *Corrective Action Reports*
- CBFO MP 10.3, *Audits*
- CBFO MP 4.10, *The Processing of TRU Waste Site Documents*
- CBFO MP 10.2, *Surveillances*

3.2 Definitions

- **Adequacy** - Addresses the flow-down or incorporation of requirements from upper tier program documents into implementing procedures.
- **Audit** - A planned and documented independent assessment to determine by investigation, examination, or evaluation of objective evidence the adequacy of and compliance with established procedures, instructions, drawings, and other applicable documents, and the effectiveness of implementation. An audit should not be confused with surveillance or inspection activities performed for the sole purpose of process control or product acceptance.
- **Assessment Team Leader** - The leader of a CBFO quality assurance, environmental, or safety and health assessment activity.

- **Certification Authority** – Authority granted to a TRU waste site by the CBFO Manager to certify that both waste containers (waste certification authority) and payload assemblies (transportation certification authority) are acceptable for shipment to the WIPP.
- **Corrective Action** - Measures taken to rectify conditions adverse to quality and, where necessary, to preclude recurrence.
- **Corrective Action Report (CAR)** – A document utilized to identify and document conditions adverse to quality (CAQ) and track the associated corrective actions.
- **Declaration of Readiness** – Declaration that implementation of the processes and site internal assessments are complete, and that the site is ready for the CBFO certification audit.
- **Final Audit Report** – A final report containing an audit description and copies of all corrective action documentation. The report incorporates New Mexico Environmental Department (NMED) review comments, if any.
- **Interim Audit Report** – A report consisting of an audit description and listing all corrective action reports. The report is sent to the audited site and copies are sent to the applicable regulatory agencies.
- **Significant Condition Adverse to Quality** - A condition which, if uncorrected, could have a serious effect on safety, operability, waste isolation, TRU waste site certification, regulatory compliance demonstration, or the effective implementation of the Quality Assurance (QA) program.

4.0 **RESPONSIBILITIES**

4.1 CBFO Manager

- 4.1.1 Implement the TRU waste site certification or recertification processes as described in this procedure.
- 4.1.2 Formally grant/suspend certification authority for a TRU waste site to ship to the WIPP.
- 4.1.3 May suspend or revoke a site's certification authority for a single or multiple processes.

4.2 CBFO National TRU Program (NTP) Assistant Manager (AM)

- 4.2.1 Assist with implementation of the certification/recertification process.
- 4.2.2 Review and approve proposed TRU waste site documents and changes in accordance with MP 4.10, *The Processing of TRU Waste Site Documents*.

4.2.3 Concur with site declaration of readiness to initiate CBFO audit process, as applicable.

4.2.4 In conjunction with the CBFO Quality Assurance Manager (QAM), formally recommend TRU waste site certification or recertification to the CBFO Manager.

4.3 CBFO Quality Assurance Manager

4.3.1 Support the certification/recertification process relative to TRU waste site certification.

4.3.2 Review and approve proposed TRU waste site documents and changes in accordance with MP 4.10, *The Processing of TRU Waste Site Documents*.

4.3.3 Schedule the initial and subsequent site audits and assign the requisite audit resources in accordance with MP 10.3, *Audits*, and ensure that an annual recertification audit is performed to verify that previously certified processes remain in compliance.

4.3.4 Issue the audit plan, audit notification letter, and interim and final audit reports in accordance with MP 10.3, *Audits*.

4.3.5 Issue and process any required audit CARs in accordance with CBFO MP 3.1, *Corrective Action Reports*.

4.3.6 Formally recommend TRU waste site certification/recertification to the CBFO Manager after the site successfully completes the audit process (including CAR closures).

4.3.7 Prepare and maintain this procedure.

5.0 PROCEDURE

5.1 NTP Declaration of Readiness Determination

5.1.1 The NTP AM and QAM review and approve TRU waste generator site program documents and/or revisions in accordance with MP 4.10, *The Processing of TRU Waste Site Documents*.

NOTE: Upon successful implementation of the process(es), the DOE TRU Manager (field element) has the responsibility to declare readiness for the certification or recertification audit to the CBFO NTP AM.

5.1.2 After the site has implemented the process(es) to be certified/recertified and obtained sufficient data, the NTP AM verifies that the site has successfully implemented the process(es) and concurs with the site's declaration of readiness.

5.1.3 If the NTP AM concurs with the site declaration of readiness, the NTP AM requests the QAM to schedule an audit of the process implementation and effectiveness.

5.2 Site Certification/Recertification Audit Process

5.2.1 Upon receipt of the notification of readiness from the NTP AM for the initial certification audit, the CBFO QAM schedules the certification site audit and assigns the necessary audit resources as defined in MP 10.3, *Audits*. For annual recertification, a declaration of readiness is not required.

5.2.2 If the audit scope includes the certification or recertification of equipment or involves a new or a process change, the assessment team leader contacts NMED and/or the Environmental Protection Agency (EPA) to determine any oversight activities to be performed by the regulators.

A. NMED requires a 30-day notification prior to the audit.

B. EPA requires a 45-day docket notification prior to the audit.

5.2.3 The CBFO audit team performs the audit in accordance with MP10.3, *Audits*.

5.2.4 The QAM schedules a post-audit debriefing from the audit team for the QAM and NTP AM.

5.2.5 The QAM issues interim and final audit reports in accordance with MP 10.3, *Audits*.

5.2.6 The interim audit report is submitted to the EPA for approval and the final audit report is submitted to NMED.

5.3 Site Certification/Recertification Process

5.3.1 After resolution of comments and approval of the final audit report by NMED, and receipt of the EPA approval letters and Inspection Reports, the NTP AM and QAM send a recommendation for certification to the CBFO Manager.

5.3.2 The CBFO Manager issues a memorandum to the site granting TRU waste certification and/or transportation authority with copies to appropriate DOE, WIPP, and generator/site contractor personnel, as well as NMED, EPA, and Environmental Engineering Group (EEG) that includes the following items:

A. List of TRU waste site program documents.

B. Dates of NMED approval and EPA inspection reports, as applicable.

C. Dates of successful PDP participation, as applicable.

D. Dates of previous certification, as applicable.

E. Attachment containing certified equipment list.

F. Attachment containing certified procedures list.

5.3.3 The NTP AM creates a records package including the following documents:

A. Current revisions of TRU waste site program documents.

B. CBFO approval letters for procedures requiring CBFO approval (changes that could affect data quality or performance criteria) prior to implementation.

C. List of current TRU waste site officials responsible for the TRU program.

D. NMED letter approving the applicable final audit report.

- E. Applicable EPA inspection reports and approval letters.
- F. Performance Demonstration Program (PDP) cycle approval letters.
- G. Waste Stream Profile Form (WSPF) approval letters (if recertification).
- H. Applicable interim and final audit reports.
- I. List of certified equipment and procedures.

5.3.4 The NTP AM and QAM evaluate new processes, new equipment, or other changes proposed by the generator/storage sites (e.g., system modifications) to determine if additional audit or surveillance is required.

5.3.5 If a certified site requests changes to an already approved site program, the review and approval process is described in MP 4.10. *The Processing of TRU Waste Site Documents.*

6.0 RECORDS

Records generated as a result of using this procedure will be processed in accordance with current records management procedures.

7.0 ATTACHMENTS

Attachment I. Flowchart of CBFO Certification/Recertification Process

ATTACHMENT I

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NEW PROCESS OR EQUIPMENT CHANGES

